

THE CITY OF NEW YORK  
**LAW DEPARTMENT**

100 CHURCH STREET  
NEW YORK, NY 10007

**MICHAEL A. CARDOZO**  
Corporation Counsel

**Jennifer L. Rubin**  
Assistant Corporation Counsel  
jerubin@law.nyc.gov  
(212) 788-1029  
(212) 788-9776 (fax)

September 26, 2007

**BY HAND**

The Honorable Laura Taylor Swain  
United States District Judge  
United States Courthouse  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**MEMO ENDORSED**

IT IS ORDERED that counsel to whom this Memo Endorsement is sent is responsible for faxing or otherwise delivering promptly a copy to all counsel and unrepresented parties and filing a certificate of such service within 5 days from the date hereof. Do not fax such certification to Chambers.

Re: Roman v. City of New York, et al.  
07 CV 7442 (LTS) (FM)

Your Honor:

I am an Assistant Corporation Counsel in the office of Michael A. Cardozo, Corporation Counsel of the City of New York, attorney in the Office of the Corporation Counsel. I write to respectfully request an enlargement of time to November 12, 2007 for the City of New York to answer or otherwise respond to plaintiff's complaint<sup>1</sup>. Plaintiff's counsel, David B. Rankin, Esq., has agreed to this enlargement of time. This is the City's first request for an enlargement of time.

In accordance with this office's obligation under Rule 11 of the Federal Rules of Civil Procedure, we need time to investigate the allegations of the complaint. In this case, plaintiff alleges, *inter alia*, that he was falsely arrested by members of the New York City Police Department on or about April 9, 2006. Accordingly, it is necessary for defendant City of New York to acquire as much information as possible concerning this matter in order to properly assess the case and respond to the complaint. To that end, this office is in the process of forwarding to plaintiff for execution a N.Y.C.P.L. § 160.50 release so that we can access the sealed records from his underlying arrest.

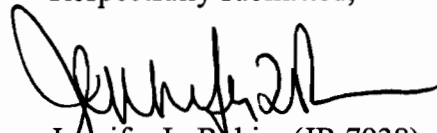
Accordingly, defendant City respectfully requests that its time to respond to the complaint be extended to November 12, 2007.

<sup>1</sup> According to the docket sheet, the individually named defendant, Officer Colasuonno, has not been served with process.

*Faxed*  
Copies ~~mailed~~ *Defl AHY 9/27/07*  
Chambers of Judge Swain

Thank you for your consideration of this request.

Respectfully submitted,

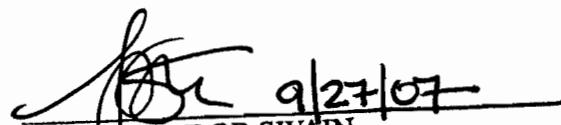


Jennifer L. Rubin (JR 7938)  
Assistant Corporation Counsel

cc: David Rankin, Esq. (By Fax) (212) 658-9480

*The request is granted.*

SO ORDERED.



LAURA TAYLOR SWAIN  
UNITED STATES DISTRICT JUDGE